

AFFIDAVIT

I, Detective Trooper Giancarlo DiGenova, being duly sworn, depose and state:

1. I am a Detective Trooper with the Vermont State Police, Northwest Narcotics Investigation Unit. I have been a law enforcement officer since 2009. Since 2012, I have been assigned to the Northern Vermont Drug Task Force (VDTF). I have participated in investigations relating to possession, distribution, and manufacturing of controlled substances, including heroin and cocaine base. I have also conducted or participated in surveillances, the execution of search warrants, debriefings of informants, and reviews of taped conversations. Through my training and experience, I have become familiar with the manner and methods of illegal drug distribution.

2. This affidavit is offered to demonstrate that probable cause exists to believe that on or about March 9, 2017, TROY WASHINGTON committed the offense of knowingly distributing heroin, a schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C), and the offense of knowingly possessing with the intent to distribute heroin, a schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

3. The facts in this affidavit come from my personal observations and knowledge, my training and experience, and information obtained from other agents, law enforcement personnel, and witnesses. This affidavit is intended to show merely that there is probable cause for the offenses charged, and does not set forth all of my knowledge about this matter.

4. On March 9, 2017, FBI Special Agent Colin Simons obtained a federal search warrant for Room 226 of the Motel 6 located at 74 South Park Drive, Colchester, Vermont from the Honorable John M. Conroy, United States Magistrate Judge for the District of Vermont. The


application and supporting affidavit for this search warrant are attached to this affidavit as Exhibit 1. The contents of Exhibit 1 remain true and correct, as recounted by SA Simons.

5. On March 9, 2017, at approximately 9:45 PM, law enforcement executed the search warrant at Room 226 of the Motel 6 located at 74 South Park Drive, Colchester, Vermont. VSP Detective Trooper Dustin Robinson located a plastic bag with hard brown powdery substance in a men's jacket, left chest pocket. This bag was later weighed, and contained approximately 34 grams of suspected heroin, including packaging. Burlington Police Department Police Officer Chase Vivori field-tested this suspected heroin, and obtained a presumptive positive for heroin. VSP Detective Trooper Ashley Barnes located a plastic bag under the sheets of the bed in the room. This plastic bag included two other plastic bags; one of these bags contained multiple additional bags containing a white rocky substance; the other contained multiple plastic bags containing a brown powder. The weight of the white rocky substance that appears to be cocaine base was approximately 10.1 grams. This substance was not field tested. The weight of the brown powder that appears to be heroin was approximately 10.4 grams. BPD Officer Vivori field tested this brown powder, and obtained a presumptive positive for heroin. During the search, Detective Trooper Robinson also located two digital scales, and a box of plastic bags. I know from my training and experience that digital scales and plastic bags are consistent with the intent to package controlled substances for distribution.

6. TROY WASHINGTON was transported to the Burlington Police Department, where he was searched incident to his arrest. WASHINGTON was found in possession of \$1,564 of United States Currency, \$160 of which prerecorded law enforcement funds used during the controlled purchase of heroin discussed in Exhibit 1.

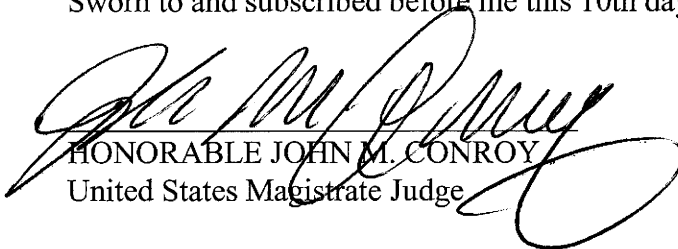
7. Based on the foregoing and the contents of Exhibit 1, I believe there is probable cause to believe that TROY WASHINGTON knowingly distributed heroin, in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C); and that TROY WASHINGTON knowingly possessed with the intent to distribute heroin, in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

Dated at Burlington, Vermont, this 10th day of March 2017.



Giancarlo DiGenova
Detective Trooper
Vermont State Police

Sworn to and subscribed before me this 10th day of March, 2017.



HONORABLE JOHN M. CONROY
United States Magistrate Judge